

# EXHIBIT B

Deposition of Steven R. Verduyn, 4/6/2005

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Q And you say, "There is a Thomas and Jeanette Disimone that own a large after-market shop in New York State that I have dealt with on other gray market activity." Do you see that?

A Yes.

Q Had dealers been advised in any way to look out for Disimones or either of the Disimones as potential purchasers of Harley bikes?

A Not to my knowledge.

Q To your knowledge, had dealers ever been given any

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1 advice or warnings about certain gray market

2 purchasers to avoid dealing with?

3 A They were not given lists of specific individuals to  
4 avoid.

5 Q Did you ever participate in any discussions at  
6 Harley-Davidson about whether or not that would be a  
7 good idea?

8 A Yes.

9 Q With whom did you discuss that?

10 A Counsel.

11 Q Who?

12 A Jenny Kent.

13 Q Anybody else?

14 A Christine Hansen.

15 Q Anybody else?

16 A Gene Ostrum.

17 Q Is he counsel?

18 A No. Gene's not counsel.

19 Q Did you discuss it with Gene Ostrum outside the  
20 presence of counsel?

21 A No, not that I recall.

22 Q Is this one particular meeting or conversation that  
23 you're thinking about?

24 A There were more than one.

25 Q When did these conversations occur?

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1 A A year or two years ago. I don't -- I don't have an  
2 exact date.

3 Q And did you discuss this matter with counsel because  
4 you were seeking legal advice?

5 A Yes.

6 Q Did you initiate the conversation with counsel, or  
7 did counsel initiate the conversation with you?

8 A Which conversation?

9 Q Well, how many conversations were there?

10 A There were a couple meetings.

11 Q Let's talk about the meetings first. Who initiated  
12 the meetings?

13 A I would have been proactive with those in asking that  
14 those be set up.

15 Q And who did you go to to set up such a meeting?

16 A The attorney on staff at the time. Initially it was  
17 Chris Hansen.

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5 Q Yeah. Before initiating a meeting with counsel, did  
6 you form an opinion or make a recommendation as to  
7 whether it would be a good idea or not for  
8 Harley-Davidson to disclose to dealers the identity  
9 of gray market actors?

10 A In my own mind, yes.

11 Q And what was that -- what was the view that you  
12 developed in your own mind?

13 A It was my opinion that that information should be  
14 shared.

15 Q Why?

16 A To stem the growth in nonretail sales activity to  
17 certain brokers, certain common last name people that  
18 were appearing throughout the country buying bikes.

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